

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO

IN THE MATTER OF  
ANA S. ABREU-CLASS  
XXX-XX-7637  
Debtor(s)

CASE NO: 10-06849

CHAPTER 13

MOTION FOR CONTINUANCE OF THE AUTOMATIC STAY IN CASE  
FILED AFTER PRIOR DISMISSAL WITHIN ONE YEAR OF FILING

TO THE HONORABLE COURT:

COMES NOW, debtor(s) through the undersigned attorney and to this Honorable Court respectfully states, alleges and prays as follows:

1. The Debtors notifies all Creditors and Parties in interest and hereby moves this Court, pursuant to § 362 (c) (3) (B), for an order continuing the automatic stay provided under § 362 (a) as to all creditors. In support of this motion, debtors state as follows:
2. The Debtors filed a petition under chapter 13 of the Bankruptcy Code on July 30<sup>th</sup>, 2010.
3. The Debtor has previously filed one (1) chapter 13 cases. It was filed on April 12, 2007 (case number 07-01937).
4. The Debtor has special circumstances and changes that will allow her to complete this new chapter 13 plan.
5. During the existence of her prior case, debtor incurred in extraordinary medical expenses caused by her medical condition. During 2009 debtor had to travel approximately four (4) times to Boston for a medical treatment. Moreover, during 2010 debtor had to travel two times to Boston to finish her medical treatment. Now debtor feels much better and she needs a second opportunity to save her home, reorganize her finances and finally obtain a discharge.
8. The petition on this case has been filed in good faith. Debtor believes that she can pay the Chapter 13 plan payment submitted to this Honorable Court. Debtor also knows that this is her last opportunity to save her home and she will make mortgage payments on time. Also debtor understands that now she will be able to fully perform the duties and obligations required under a chapter 13 case and under the terms of the proposed plan.
7. The debtors' prior Chapter 13 case was dismissed on March 24<sup>th</sup>, 2010. It was her only previous case and it was dismissed for reasons out of her control.

WHEREFORE, the Debtor requests that this Honorable Court continue the automatic stay under section 362(a) as to ALL CREDITORS for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under Section 362(c)(1) or (c)(2), or a motion for relief is granted under Section 362(d).

A. S. A.

NOTICE

“PARTIES IN INTEREST ARE HEREBY GRANTED ELEVEN (11) DAYS FROM THE DATE OF THIS NOTICE AND REQUEST A HEARING. IF NO OPPOSITION IS FILED WITHIN THE PRESCRIBED PERIOD OF TIME, THE COURT WILL ENTER AN ORDER GRANTING THE MOTION UPON THE FILING OF A CERTIFICATE BY THE MOVANT THAT ADEQUATE NOTICE WAS GIVEN. SHOULD AN OPPOSITION BE TIMELY FILED, THE COURT WILL SCHEDULE THE MOTION FOR A HEARING AS A CONTESTED MATTER. ABSENT GOOD CAUSE, UNTIMELY REJECTION SHALL BE DENIED.”

I HEREBY CERTIFY: That a copy of this motion has been served to the Chapter 13 trustee, through CMECF and to all creditors and parties in interest as per the Master Address List.

RESPECTFULLY SUBMITTED

In Hatillo to San Juan, Puerto Rico, this 30<sup>th</sup> day of July 2010

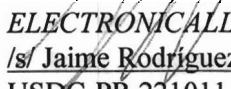
I, Ana S. Abreu S. Class, of legal age, single, retired and neighbor of Bo. Yeguada at Hatillo, Puerto Rico, declares under penalty of perjury that the information provided in this motion is true, correct and provided in good faith. Also I declare that my attorney prepared this motion in front of me and in accordance with my instructions and the information provided by me.

In Hatillo, Puerto Rico, this 30<sup>th</sup> day of July 2010

  
s/Ana S. Abreu-Class

Ana S. Abreu Class

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ELECTRONICALLY FILED  
/s/ Jaime Rodríguez-Pérez  
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## MASTER ADDRESS LIST

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